

Hecker Fink LLP

350 FIFTH AVENUE | 63RD FLOOR
NEW YORK, NEW YORK 10118

1050 K STREET NW | SUITE 1040
WASHINGTON, DC 20001

TEL (212) 763-0883 | FAX (212) 564-0883

WWW.HECKERFINK.COM

DIRECT DIAL 929.294.2540

DIRECT EMAIL jdabbs@heckerfink.com

MEMO ENDORSED ,pg. 2.

March 24, 2025

BY CM/ECF

The Honorable Edgardo Ramos
United States District Court for the Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, New York 10007

Re: United States v. Clarke, 24-cr-171 (ER)

Dear Judge Ramos:

We represent defendant Cadeem Clarke in the above-captioned matter. We write to respectfully request that the Court adjourn the status conference scheduled for March 26, 2025; so-order the briefing schedule set out below for Mr. Clarke's submission of any pretrial motion; and set a control date for oral argument or an evidentiary hearing on that motion. The Government consents to these requests.

On January 17, the Court held a status conference in this matter at which the parties requested that they be permitted to propose a pretrial motion schedule at the next status conference. The Court accordingly scheduled a conference on February 20. At Defendant's request, and with the Government's consent, the Court adjourned that conference until March 26 so that the undersigned could continue to receive and review discovery relevant to pretrial motion practice.

The parties now propose the following schedule for any pretrial motion to be made by Mr. Clarke, subject to the Court's availability and approval:

- April 16: Defendant's motion due
- April 30: Government's opposition due
- May 7: Defendant's reply due

Hecker Fink LLP

2

- May 28, 29, or 30: oral argument or evidentiary hearing on Defendant's motion, as necessary

The Government also requests, and we do not object to, an exclusion of speedy trial time from March 26 until the parties' appearance before Your Honor on any pretrial motion made by Defendant, pursuant to 18 U.S.C. § 3161 and in the interest of justice, in order to permit Defendant to continue to review discovery, and to consider and file any pretrial motions.

We thank the Court for its consideration of these requests.

Respectfully submitted,



Jenna M. Dabbs

The proposed briefing schedule is approved. A conference is scheduled for May 28, 2025, at 2 p.m. Speedy trial time is excluded from March 26, 2025, until May 28, 2025, in the interest of justice.

SO ORDERED.



Edgardo Ramos, U.S.D.J.

Dated: 3/24/2025

New York, New York